

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ALEXANDER STYLLER, INTEGRATED
COMMUNICATIONS & TECHNOLOGIES,
INC., JADE CHENG, JASON YUYI, CATHY
YU, CAROLINE MARAFAO CHENG,
PUSHUN CHENG, CHANGZHEN NI,
JUNFANG YU, MEIXIANG CHENG,
FANGSHOU YU, and CHANGHUA NI,

Plaintiffs,

vs.

HEWLETT-PACKARD FINANCIAL
SERVICES COMPANY, HEWLETT-
PACKARD FINANCIAL SERVICES (INDIA)
PRIVATE LIMITED, HP INC., HEWLETT
PACKARD ENTERPRISE COMPANY, and
DAVID GILL

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

**DEFENDANTS' ASSENTED-TO MOTION TO IMPOUND EXHIBITS TO
DECLARATION OF KEVIN C. QUIGLEY**

Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett-Packard Enterprise Company, and David Gill (collectively, "Defendants") hereby move, pursuant to Local Rule 7.2, that the Court impound certain exhibits attached to the Declaration of Kevin C. Quigley in Further Support of Defendants' Motion for Summary Judgment ("Quigley Reply Declaration") ([ECF 525](#)), until further order of the Court. Grounds for this motion are as follows:

1. Exhibit 66 to the Quigley Reply Declaration is a document designated by Plaintiffs as "CONFIDENTIAL" under the Joint Stipulated Protective Order ("Protective Order") entered in this case ([ECF 186](#)). This document also contains certain personal identifying and/or medical information related to the Plaintiffs.

2. Exhibit 70 to the Quigley Reply Declaration is a deposition transcript designated by Defendants as “CONFIDENTIAL” under the Protective Order.

3. The Protective Order mandates that all materials designated as “CONFIDENTIAL” shall be filed under seal. [ECF 186](#), ¶ 9.

4. Defendants’ counsel has conferred with Plaintiffs’ counsel regarding this Motion, and Plaintiffs assent to the filing of this Motion.

WHEREFORE, in an effort to comply with their obligations under the Protective Order, Defendants respectfully request that Exhibits 66 and 70 to the Quigley Reply Declaration be impounded until further order of the Court. Upon termination of the impoundment period, outside counsel for Defendants will retrieve and take custody of the impounded materials.

Dated: August 16, 2021

Respectfully submitted,

/s/ Kevin C. Quigley

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Counsel for Defendants

Local Rule 7.1(a)(2) Certification

I, Kevin C. Quigley, Attorney for Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett Packard Enterprise Company, and David Gill, hereby certify that on August 13, 2021 and August 16, 2021, I conferred with Plaintiffs' counsel, Alex Zuckerman, via email. He indicated that Plaintiffs assent to this motion.

/s/ Kevin C. Quigley
Kevin C. Quigley

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